

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

ROBERT DE VITO, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

LIQUID HOLDINGS GROUP, INC., BRIAN
M. STORMS, KENNETH D. SHIFRIN,
PETER R. KENT, RICHARD SCHAEFFER,
BRIAN FERDINAND, JAY BERNSTEIN,
DARREN DAVY, DAVID FRANCESCANI,
WALTER RAQUET, THOMAS ROSS,
VICTOR SIMONE, JR., DENNIS SUSKIND,
ALLAN ZAVARRO, and SANDLER,
O'NEILL & PARTNERS, LP.,

Defendants.

Civil Action No. 2:15-cv-6969-KM-JBC

September 15, 2016

**DEFENDANTS' UNOPPOSED MOTION FOR
REVISED BRIEFING SCHEDULE**

Defendants hereby respectfully move to request a modification of the Stipulation and Order Granting Briefing Schedule ("Briefing Schedule") entered by this Court on June 16, 2016 [Doc. No. 58], to adjust the dates by which Defendants must file answers to, or motions to dismiss, the Amended Class Action Complaint ("Amended Complaint"). Defendants anticipate filing motions to dismiss the 136-page Amended Complaint, which was filed on July 22, 2016, and which names certain Defendants who were not included in the original Complaint.

Accordingly, Defendants request a short 30-day extension of the September 30, 2016 date by which such motions are to be filed, and accompanying adjustments to the Briefing Schedule as follows:

1. Defendants' answers to, or motions to dismiss, the Amended Complaint must be filed by October 31, 2016;
2. If Defendants file motions to dismiss the Amended Complaint, then Lead Plaintiffs shall file their responses by December 21, 2016; and
3. Defendants shall file any replies in support of their motions to dismiss by February 6, 2017.

The Defendants named for the first time in the amended complaint previously have requested extensions of their time to respond to the amended complaint so that the schedule for their responses was the same as provided for in the previously established scheduling order. This is Defendants' first request for an extension of the schedule set forth for all Defendants in the scheduling order. Lead Plaintiffs' counsel has consented to this application.

Dated: September 15, 2016

Respectfully submitted,

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SO ORDERED on this _____ day of _____, 2016.

JAMES B. CLARK III, U.S.M.J.

CERTIFICATE OF SERVICE

I hereby certify that on September 15, 2016, a copy of the foregoing Unopposed Motion for Revised Briefing Schedule was filed electronically and served by mail on anyone unable to accept electronic filing. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the Court's CM/ECF System

Date: New York, New York
September 15, 2016

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